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E-FILED: January 31, 2013

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5 Attorneys for Defendant
6 MOUNTAIN VIEW WHISMAN SCHOOL
7 DISTRICT

8 THE UNITED STATES DISTRICT COURT FOR THE
9
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN JOSE DIVISION

12 CHRISTINA MOORE,

No. CV12-02911 HRL

13 Plaintiff,

**STIPULATION AND [PROPOSED] ORDER
EXTENDING TIME FOR MEDIATION AND
DISCOVERY (MODIFIED BY THE COURT)**

14 vs.
15 MOUNTAIN VIEW WHISMAN
16 SCHOOL DISTRICT, and DOES 1-100,
inclusive,

17 Defendants.

18
19 IT IS HEREBY STIPULATED, pursuant to Civil Local Rule 6-2, between Plaintiff
20 CHRISTINA MOORE and defendant MOUNTAIN VIEW WHISMAN SCHOOL DISTRICT,
21 that the mediation deadline and fact and expert discovery deadlines be extended 60 days.

22 Pursuant to the Court's Case Management Order & Order Referring The Case To
23 Mediation [Document19], mediation is to be completed no later than January 30, 2013.
24 Good cause exists to extend the time in which to mediate this matter and to extend the
25 court appointed dates for completion for fact discovery and expert discovery for the
26 following reasons:

27 1. Counsel for defendant Mountain View Whisman School District just

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1 substituted into this matter in place and stead of Hopkins & Carley and the Court just
2 signed the Order on January 22, 2013 [Document23].

3 2. Efforts to schedule the mediation have been hampered due to serious health
4 issues with Court staff mediator G. Daniel Bowling. Mr. Bowling is currently consulting with
5 his physician and setting up a treatment schedule and will be in a better position to assess
6 when he will be available for a mediation by approximately February 11, 2013. At that time
7 we should be able to schedule a mediation hearing date.

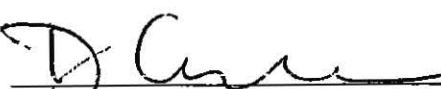
8 3. The parties are currently holding March 14, March 18 and March 20 as
9 potential mediation dates.

10 The parties therefore request the court continue the deadline for completion of
11 mediation and for completion of fact and expert discovery as follows:

12	Last day to complete mediation current date 1/30/13	April 1, 2013
13	Fact Discovery Cutoff current date 3/5/13	May 6, 2013
15	Designation of Experts with Reports current date 3/19/13	May 20, 2013
17	Designation of Rebuttal Experts with Reports current date 4/16/13	June 17, 2013
19	Expert Discovery Cutoff current date 5/7/13	July 8, 2013
21	Last Day for Hearings on Dispositive Motions current date 6/25/13	August 27, 2013
23	Final Pretrial Conference current date 8/1/13	October 3, 2013

24
25 DATED: 1/30/13

LAW OFFICES OF JOHN F. MARTIN


DENISE M. CARDOSO,
Attorneys for Plaintiff

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1 DATED: 1-30-13

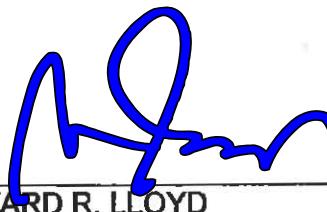
DAVIS & YOUNG, APLC

2
3 By Mark Davis
4 MARK E. DAVIS
5 Attorneys for Defendant

6 AS MODIFIED BY THE COURT,
7 PURSUANT TO STIPULATION, IT IS SO ORDERED.
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9 DATED: January 31, 2013

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11 HOWARD R. LLOYD
12 UNITED STATES DISTRICT
13 MAGISTRATE JUDGE



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